



Hiperbaric

HIGH PRESSURE TECHNOLOGIES

| CODE OF | CONDUCT

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1. Purpose

Organizations have the duty to self-regulate, preventing and detecting, diligently, non-compliance with the laws, regulations, and ethical values applicable to them. In this sense, the Hiperbaric Code of Conduct defines and develops the foundations of ethical and legal behavior that all Hiperbaric employees must comply with in the performance of their work.

The purpose of the Hiperbaric Code of Conduct is to:

- **Fulfill the ethical values of the organization:** We must defend our ethical values as a fundamental pillar of our activity. Thanks to our team, we have been able to lead the market in the design, manufacture and marketing of high-pressure industrial equipment (HPP) worldwide, launch a line of industrial machinery for hot isostatic pressing (HIP), as well as move forward steadily from 2021 in another innovative line of business, namely high-pressure hydrogen compressors (H2).
- **Prevent the commission of crimes within the organization:** In 2010, after the entry into force of Organic Law 5/2010, of June 22, and Organic Law 1/2015, of March 30, the criminal liability of legal entities was introduced in the Spanish legal system. Hiperbaric, as a legal entity, may be criminally liable for the actions of its managers and other employees that constitute an offense for which the legal entity may be responsible, provided that Hiperbaric obtains any direct or indirect benefit for the commission of said offense. Hiperbaric has zero tolerance for the commission of crimes. This Code of Conduct details the permitted and prohibited conduct for the purpose of preventing corporate crimes.
- **Comply with Law 2/2023, of February 20, on the protection of persons who report regulatory breaches and the fight against corruption:** Law 2/2023 transposes Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23, 2019, on the protection of persons reporting breaches of Union law into the Spanish legal system. Law 2/2023, of February 20, requires certain organizations to create mechanisms for reporting corporate breaches, as well as the establishment of measures to protect whistleblowers who report potential irregularities. This Code of Conduct sets out the breaches that should be reported, our corporate information channel and the protection provided to whistleblowers acting in good faith.

By this policy and by its corporate standards, Hiperbaric Management declares and undertakes to ensure the legality of all business activities and to correct behaviors that go beyond or deviate from what is legally acceptable and that may be considered illegal or reprehensible in accordance with applicable regulations.

2. Ethical values

Hiperbaric has clearly and solidly established hallmarks based on customer service excellence and commitment to people. These values are projected both internally and among its members, as well as in the relationship with customers and towards society in general.

Our organization's reputation is driven primarily by our commitment to the following values and principles:

- Customer orientation/Reliability.
- Trust.
- Enthusiasm, dedication, and commitment.
- Initiative and innovation.
- Teamwork.
- Resourcefulness.
- Transparency.

These values and principles are inextricably linked, so all members of the organization have the duty to comply with them and the responsibility to convey them in their activity in the organization, always with full respect of the applicable regulations.

3. Crime prevention in Hiperbaric

Organic Law 10/1995, of November 23, of the Criminal Code, as amended by Organic Law 5/2010, of June 22, and Organic Law 1/2015, of March 30, provides for the criminal liability of legal entities. Hiperbaric may be criminally liable for the actions of its managers and other employees that constitute an offense for which the legal entity may be responsible, provided that Hiperbaric obtains any direct or indirect benefit for the commission of said offense. Hiperbaric does not tolerate, in any case, the commission of crimes by its employees. Therefore, the following action procedures have been set for each identified crime:

- **Scams:**

Hiperbaric employees are subject to the principles of clarity and transparency, and must take special care to offer potential customers, and customers, only the products or services that suit their knowledge and needs, so that services are hired once the potential customer or customer understands their content, benefits, risks, and costs. Therefore, and without prejudice to this general rule, Hiperbaric employees must:

- o Inform customers impartially and rigorously about the various products and services, explaining all the relevant elements and warning them of the applicable risks, expenses, and commissions.
- o Apply the approved or agreed rates and commercial conditions where appropriate.

- Ensure that the hiring of products and services is carried out in the manner established in the internal procedures.

- **Against intellectual and industrial property:**

Hiperbaric employees are only authorized to use the training material delivered by the organization to carry out their work activity. Hiperbaric employees are prohibited from using any type of material without prior proof that the organization has acquired the corresponding rights and/or licenses.

Hiperbaric employees may not install or use on the computer equipment the organization provides them with programs or applications that are illegal to use or may damage the systems or harm the image or interests of the organization, customers, or third parties. Likewise, they may not use software tools for work activity on either corporate or personal computers without having prior proof that the organization has acquired the corresponding rights and/or licenses.

Hiperbaric employees may not use patents or utility models that Hiperbaric does not have the industrial property rights for.

- **Computer damages:**

Hiperbaric employees are expressly prohibited from accessing applications or computer equipment of third parties outside the organization without authorization, refraining from deleting, damaging, deteriorating, altering, eliminating or blocking access to data, programs or electronic documents, or hindering or interrupting the operation of a third-party computer system.

- **Discovery and disclosure of secrets and computer breaches:**

Hiperbaric receives confidential information from third parties, such as clients and their customers, as well as from business partners or others the company has business relationships with. Hiperbaric employees must protect and treat this confidential information appropriately, in accordance with the obligations arising from the applicable laws in force, from contracts with customers, and particularly in accordance with the Employee Safety Manual, which you have been informed of. Hiperbaric employees are prohibited from engaging in conduct that may lead to computer breaches, such as hacking or using software or passwords to access information systems illegitimately.

- **Cash:**

Hiperbaric employees may not receive cash from customers, suppliers or other third parties. Hiperbaric employees may use cash received by the organization only for the purposes for which it was provided to them, and all expenses must be duly justified.

Hiperbaric employees must exercise extreme diligence to avoid any type of practice when performing their duties that may involve putting counterfeit currency into circulation. You must inform your immediate manager if you notice that you have received fake/counterfeit coins or banknotes.

- **Gifts:**

Sometimes, business gifts such as presents, meals, travel, or leisure activities may be used to strengthen relationships, celebrate successes, and foster a good working environment. Offering or receiving business gifts can easily create conflicts of interest and may even be considered illegal. Company gifts sent or offered by Hiperbaric employees must not in any case seek to influence the business decisions of the person offering the gift or the person receiving it. The exchange of gifts and presents is considered acceptable if it is clearly related to a business objective and is seen as a normal part of the business relationship. Cultural matters should be considered when deciding what is appropriate as a business gift. It is never considered appropriate to offer or accept a business gift that may be understood as disproportionate or that may give the impression that it is intended to influence business decisions. If you work with public entities, you are expressly prohibited from offering or accepting gifts or presents.

- **Bribery and influence peddling:**

Hiperbaric employees must refrain from offering or accepting gifts, commissions, or remuneration to/from authorities, politicians, and institutions in general or their representatives, as well as from making contributions to them at the organization's expense. Association, membership, or collaboration with political parties or with other types of entities, institutions or associations with public purposes, and any contributions of services to them, must be done in a way that stresses their personal character and avoids any involvement with Hiperbaric.

Hiperbaric employees must refrain from influencing a public official by taking advantage of any situation arising from their personal relationship with said person or with another public official or authority to secure any type of benefit, whether direct or indirect.

Any meeting or visit between a Hiperbaric employee and a public official must be held in the presence of at least two employees of the organization.

- **Against natural resources and the environment:**

Hiperbaric employees must ensure that none of their actions may be likely to harm natural resources and the environment. In this regard, Hiperbaric has storage and destruction protocols for hazardous substances, which are mandatory for all its employees.

- **Smuggling:**

All imports and exports of material must, in any case, pass the relevant customs controls and any concealment of material from customs authorities is strictly prohibited.

- **Crimes against the Public Treasury and Social Security:**

Hiperbaric employees are prohibited from using non-transparent structures for tax-evasion purposes, understood as those in which, through the interposition of natural persons or instrumental companies based or not in tax havens, or territories that do not cooperate with tax authorities, are designed with the purpose of preventing the authorities from knowing who is ultimately responsible for the activities or the ultimate holder of the funds. It is forbidden to falsify, conceal or simulate data, entries and/or accounting operations, double counting, invoices, etc. that have the purpose of avoiding payments, or obtaining illicit profits, to the detriment of the Public Treasury or Social Security. Accounting staff are obliged to ensure that accounting is done correctly and is in keeping with reality so that it reflects the true and fair view of the organization's assets and financial situation. Accounting staff are obliged to keep and store all documentation used to exercise their professional activity for the appropriate legal periods.

The organization's financial information must be prepared with reliability and rigor, ensuring that:

- The transactions, facts and all other events included in the financial information effectively exist and have been registered at the appropriate time.
- The information reflects the totality of the transactions, facts and all other events in which the organization is involved.
- The transactions, facts and all other events are registered and assessed in conformity with the applicable regulations.
- The financial information reflects, on the corresponding date, the rights and obligations through the corresponding assets and liabilities, in conformity with the applicable regulations.

Hiperbaric employees shall ensure that any grant capital they may receive is used for the purpose of the grant. Hiperbaric shall not apply for any grants for which it does not meet the requirements.

- **Money laundering:**

Hiperbaric employees must reject any type of offer to participate, in any way, in the concealment or disguise of the illicit origin of goods.

- **Criminal insolvency:**

Hiperbaric employees must exercise due diligence in the keeping of economic and financial aspects, observing the relevant regulations in this regard, and ensuring that the financial information provided to the company or provided by it is a true reflection of finances and assets. They shall also avoid illegitimately contributing to third-party collection capacities or guarantees.

- **Concealment of assets:**

Hiperbaric employees are prohibited from presenting to the executing authority or official in a judicial or administrative enforcement proceeding an incomplete or false list of assets or equity, thereby delaying, hindering, or impeding the satisfaction of the creditor; as well as failing to facilitate the aforementioned list of assets or equity when it has been required. Likewise, Hiperbaric employees are prohibited, where appropriate, from making use of assets seized by a public authority that had been provided in deposit, without being authorized to do so.

- **Against the rights of workers:**

Hiperbaric employees must not engage in or provoke or collaborate in conduct or actions that, individually or collectively, may endanger the integrity of themselves and/or other affected staff. Likewise, they are obliged to report the existence of any dangerous situation they become aware of in the exercise of their work responsibilities, as well as the possible ineffectiveness or inadequacy of the protection equipment for individual or collective use that is provided to them. Hiperbaric employees must assume and abide by the established procedures regarding occupational risk.

4. Breaches established in Law 2/2023 of February 20

Law 2/2023, of February 20, on the protection of persons who report regulatory breaches and the fight against corruption aims to enhance the application of European Union law in specific areas, by establishing common minimum standards that provide a high level of protection for persons who report breaches of Union law.

In this respect, Law 2/2023, of February 20, protects whistleblowers acting in good faith reporting issues related to the following matters:

- Public procurement;
- Financial services, products, and markets;
- Prevention of money laundering and financing terrorism;
- Product safety and compliance;
- Transport security;

- Environmental protection;
- Radiation protection and nuclear safety;
- Food and feed safety, animal health, and animal welfare;
- Public health;
- Consumer protection;
- Protection of privacy and personal information;
- Security of networks, and information systems;
- Affecting the financial interests of the EU;
- Concerning the domestic market, including breaches of EU competition rules and state aid, as well as breaches concerning the domestic market with acts that breach corporation tax rules or practices aimed at obtaining a tax advantage that undermines the object or purpose of the applicable legislation on corporation tax; and
- Concerning actions or omissions that may constitute a serious or very serious criminal or administrative offense, especially those related to economic losses for the Public Treasury and Social Security.

5. Internal Information System - Internal complaints channel

5.1. Persons who can report information

The following persons may report information to the Internal Information System Manager:

- Hiperbaric employees;
- Volunteers, interns and trainees at Hiperbaric;
- Job candidates at Hiperbaric in cases in which information about the breach was obtained during the selection process or the pre-contractual negotiation;
- Former Hiperbaric employees;
- Hiperbaric shareholders;
- Persons belonging to Hiperbaric's administrative, management and supervisory body;
- Persons working for or under the supervision and direction of Hiperbaric's contractors, subcontractors and suppliers; and
- Staff of Hiperbaric's customers and agents.

5.2. Internal Information System Manager

In order to give effect to the provisions of this Code of Conduct, any doubt, complaint, suggestion, observation, indication, suspicion or claim must be reported, **on a mandatory basis**, to the Hiperbaric's

Internal Information System Manager, in order to formally process the request, and if necessary, proceed to open the corresponding internal investigation file to assess each case and defend the rights of the injured party(s).

Hiperbaric’s Compliance Body, as a collegiate body, is responsible for the Internal Information System, and it has delegated the powers of managing and processing investigation files to Ms. María Ojeda.

INTERNAL CHANNELS FOR REPORTING INFORMATION	
Ms. María Ojeda Díez	<p>In-person: In writing or orally, at the request of the whistleblower.</p> <p>Email: To the address canaldedenuncias@hiperbaric.com</p>

5.3. Content of the complaint

Complaints submitted through any of the channels indicated in the previous section must contain at least the following information:

- Name and contact details of the whistleblower (optional). Hiperbaric accepts anonymous complaints.
- Clear and detailed statement of the facts reported.
- Identification of the area or department in which it has taken place.
- Identification of the people involved with the reported behavior or with knowledge of it.
- The time when it occurred or the period of time it has been occurring.
- Provide, if deemed necessary, documents or other information deemed relevant to the assessment and resolution of the complaint.

5.4. Internal information management procedure

The Internal Information System will be the preferred channel to report information. The Internal Information System Manager shall acknowledge receipt of the information reported within a maximum period of 7 days after its submission of the information. The information will be analyzed to decide on its admissibility or inadmissibility. In the event that it is admitted, all the evidence that the Internal Information System Manager deems necessary shall be collected, including a request for additional information from the whistleblower. The reported person will be given the opportunity to defend themselves, and the procedure will end with the resolution of the file, which will generally take place within a maximum period of three months, except in cases of particular complexity, in which case the maximum period may be extended for an additional

three months. If it is found that irregularities are being committed, Hiperbaric will take relevant labor and legal action.

All Hiperbaric employees are required to report suspected irregularities they are aware of. Failure to report the alleged irregularities observed may also be punished.

6. External information channel - External complaints channel

Regarding the list of irregularities established in Law 2/2023, of February 20, on the protection of persons who report regulatory breaches and the fight against corruption, whistleblowers may opt to:

- Report the information, first, to the Internal Information System Manager at Hiperbaric. **This will be the preferred channel;**
- Submit the complaint, second, to the Independent Whistleblower Protection Authority; or
- Submit the complaint directly to the Independent Whistleblower Protection Authority.

The information reported to the Independent Whistleblower Protection Authority shall be processed in accordance with the provisions of articles 16 et seq. of Law 2/2023 of February 20.

7. Public disclosure

Regarding the list of irregularities established in Law 2/2023, of February 20, in the event of either of the two circumstances described below, the whistleblower may make a public disclosure under the protection given by the aforementioned Law:

- A complaint has been filed through internal and/or external channels without appropriate measures having been taken in this regard; or
- The whistleblower considers that they have reasonable grounds to believe that:
 - o The breach may constitute an imminent or manifest danger to the public interest (e.g., emergency situation or risk of irreversible damage); or

In the event of an external complaint, there is a risk of retaliation or there is little likelihood of effective treatment of the breach due to the particular circumstances of the case (concealment and/or destruction of evidence, or that an authority is in collusion with the offender, for example). The conditions of protection in cases of public disclosure shall not apply to Hiperbaric when the person has disclosed information directly to the press, in accordance with the exercise of the right to freedom of expression and truthful information provided for in the Constitution and its implementing legislation.

8. Whistleblower protection measures

In no case will Hiperbaric tolerate retaliation, threats of retaliation and attempted retaliation such as suspension, dismissal, coercion, intimidation, disciplinary action, etc. against a whistleblower for reporting allegedly unlawful acts in good faith. A complaint will be considered to have been made in good faith when it is considered that the whistleblower might have reasonable grounds to believe that the breach was being committed. The whistleblower shall not incur any liability provided that the way they accessed the information on which the complaint is based was obtained without committing any offense.

All complaints will be treated with strict confidentiality and through a secure channel. Hiperbaric guarantees the security of the complaints channel, as well as the proper recording of any communication received. As indicated in the above section, **Hiperbaric accepts anonymous complaints.**

Whistleblower protection measures shall cover:

- The whistleblower themselves, whether employed, self-employed, shareholder, a person belonging to Hiperbaric's administrative, management and supervisory body, as well as any person working for or under the supervision and direction of Hiperbaric's contractors, subcontractors and suppliers. Whistleblowers who communicate or publicly disclose information on breaches obtained in the framework of an employment relationship that has already ended, volunteers, interns, trainees, and job candidates in cases in which the information on the breach was obtained during the selection process or pre-contractual negotiation will also be covered by these measures;
- Legal representatives of workers in the exercise of their functions of advice and support to the whistleblower;
- Natural persons assisting the whistleblower during the reporting and information management process;
- Natural persons who are related to the whistleblower and who may suffer retaliation, such as coworkers or relatives of the whistleblower; and
- Legal entities for which the whistleblower works or with which they maintain any other type of relationship in an employment context or in which they hold a significant share.

Persons who communicate or disclose the following are excluded from the scope of protection:

- Information contained in communications that have not been admitted by the internal information channel;
- Information related to complaints about interpersonal conflicts or that only affect the whistleblower and the persons to whom the communication or disclosure refers;
- Information that is already fully available to the public or that constitutes mere hearsay; and
- Information that refers to actions or omissions that do not fall within the scope of this Code.

9. Personal data protection

Hiperbaric undertakes to process the personal data it accesses through the management of the Internal Information System in an absolutely confidential manner and in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679, Organic Law 3/2018, of December 5, on Data Protection and Guarantee of Digital Rights, and Law 2/2023, of February 20, on the protection of persons who report regulatory breaches and the fight against corruption, and has adopted in this regard the appropriate technical and organizational measures to ensure data protection and information security.

Interested parties are required to provide accurate, complete, up-to-date and, in particular, truthful data and information, which must be duly substantiated facts or suspicions.

The personal data collected through the Internal Information System will be processed by Hiperbaric in order to investigate the complaint submitted, on the legitimate basis to fulfill a legal obligation (Article 6.1 c) GDPR) — in those cases in which the complaint relates to breaches established in Law 2/2023, of February 20 —, and in the legitimate interest of Hiperbaric (Article 6.1 f) GDPR) — in those cases in which the complaint is based on a breach related to Hiperbaric's ethical standards. Personal data will not be transferred to third parties, unless legally required. Personal data will be kept for the time needed to investigate and resolve the complaint and, subsequently, for the duration of any possible liabilities, with a maximum retention period of 10 years. The whistleblower and reported person may exercise their rights of access, rectification, deletion, opposition, portability, and limitation by writing to rrhh@hiperbaric.com. Likewise, they have the right to lodge a complaint with the Spanish Data Protection Agency if deemed appropriate.

In any case, the reported person will be informed of the existence of a complaint at the time it is admitted for processing, unless the Internal Information System Manager assesses, based on the risks of concealment/destruction of evidence, or other reasons related to the obstruction of the investigation process, that rapid communication may hinder or condition the investigation's resolution. In order to allow the reported person to exercise their rights and make representations, such communication may not be delayed or exceed a maximum period of three months from the receipt of the complaint. **Under no circumstances will the reported person be informed of the identity of the whistleblower.**

The whistleblower's personal data will be kept confidential. The identity of the whistleblower may only be disclosed to the Judicial Authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or sanctioning investigation.

The following personal data will be deleted immediately:

- Unnecessary personal data collected by accident;
- Personal data that are not necessary for the understanding and investigation of the files;
- Personal data related to conduct that is not included in the scope of application of the Internal Information System;
- Untruthful personal data, unless such lack of truthfulness may constitute a criminal offense;

- Personal data contained in complaints in which three months have elapsed since receipt of the information, and no investigative actions have been initiated, unless it is necessary to retain such personal data to provide evidence of the operation of the system; and
- Personal data contained in complaints that have not been admitted for processing.

The personal data of the persons involved in the investigation process may only be accessed by:

- The Internal Information System Manager;
- The Human Resources Manager only when disciplinary measures may be taken against an employee;
- External service providers supporting Hiperbaric in the processing of an investigation; and
- Other persons or third parties when necessary for the adoption of corrective measures at Hiperbaric, or for the processing of any sanctioning or criminal proceedings that may apply.

10. Update of the Code of Conduct

This Code of Conduct may be subject to change when thus required by Hiperbaric's Compliance Management System, as well as when necessary due to changes in the applicable regulations. The Code of Conduct published on the Hiperbaric website shall in any case be the current version of the document.